

**McGLINCHEY STAFFORD**

Brian A. Paino (SBN 251243)  
Dhruv M. Sharma (SBN 248146)  
18201 Von Karman Avenue, Suite 350  
Irvine, California 92612  
Telephone: (949) 381-5900  
Facsimile: (949) 271-4040  
Email: bpaino@mcglinchey.com  
dsharma@mcglinchey.com

Attorneys for *Defendant* **QUICKEN LOANS INC.**

Shawna Derringer  
1200 High Bluff Ave.  
San Marcos, California 92078.

*Plaintiff in pro per*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

SHAWNA DERRINGER,

Plaintiff,

v.

QUICKEN LOANS INC.,

Defendant.

Case No.: 3:16-cv-01228-BAS-WVG

Hon. District Judge Cynthia Bashant  
Hon. Mag. Judge William V. Gallo

**JOINT MOTION TO DISMISS  
COMPLAINT PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 41(a)(1)(A)(ii)**

**Hearing: [No Hearing Required]**

Action Filed: May 4, 2016  
Trial Date: NA

Pursuant to Local Civil Rule 7.2 and this Court's Standing Order, *plaintiff* Shawna Derringer ("Plaintiff"), *in pro per*, and *defendant* Quicken Loans Inc. ("Quicken Loans"), through its attorneys of record, hereby jointly move the Court for an order dismissing this case *with prejudice* pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). This motion is made with reference to the following facts:

//./

1. On May 4, 2016, Plaintiff commenced this action by filing a complaint (the "Complaint") against Quicken Loans in the Superior Court of the State of California for the County of San Diego (the "Action").

2. Quicken Loans removed the Action to this Court on May 23, 2016, and filed an answer to the Complaint on June 30, 2016.


3. Subsequently, the Parties were able to resolve all issues raised in the Complaint and therefore desire to dismiss the Action. The Parties agree that they shall bear their own fees and costs, including all attorneys' fees, incurred in connection with the Action.

Based upon the foregoing, the Parties respectfully request that the Court:

1. Dismiss the Action *with prejudice* pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii);

2. Vacate all future hearing dates in the Action.

DATED: 7/20/16

By:   
SHAWNA DERRINGER  
Plaintiff in pro per

DATED: 7/21/16

**McGLINCHEY STAFFORD**

By:   
DHRUV M. SHARMA  
BRIAN A. PAINO  
Attorneys for Defendant **QUICKEN LOANS INC.**

**PROOF OF SERVICE**

1  
2  
3 **STATE OF CALIFORNIA** )  
4 **COUNTY OF ORANGE** ) **ss.**

5 I, Carol Rico, declare:

6 I am employed in the County of Orange, State of California. I am over the age of 18  
7 and not a party to the within action. My business address is 18201 Von Karman Ave.,  
Suite 350, Irvine, California 92612.

8 On July 21, 2016, I served the document(s) described as: **JOINT MOTION TO**  
9 **DISMISS COMPLAINT PURSUANT TO FEDERAL RULE OF CIVIL**  
**PROCEDURE 41(a)(1)(A)(ii)** as follows:

10 ☐ **BY MAIL:** As follows:

11 ☐ **FEDERAL** – I deposited such envelope in the U.S. mail at Irvine,  
12 California, with postage thereon fully prepaid,

13 ☒ **BY OVERNIGHT COURIER SERVICE** as follows: I caused such envelope  
14 to be delivered by overnight courier service to the offices of the addressee. The  
envelope was deposited in or with a facility regularly maintained by the  
overnight courier service with delivery fees paid or provided for.

15 ☒ **BY EMAIL SERVICE** as follows: By email or electronic transmission: Based  
16 on any agreement between the parties and/or as a courtesy, I sent the  
document(s) to the person(s) at the email address(es) listed on the service list. I  
17 did not receive, within a reasonable time after the transmission, any electronic  
message or other indication that the transmission was unsuccessful.

18 ☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I caused said  
19 document(s) to be served by means of this Court's Electronic transmission of  
the Notice of Electronic Filing through the Court's transmission facilities, to the  
20 parties and/or counsel who are registered CM/ECF users set forth in the service  
list obtained from this Court. Pursuant to Electronic Filing Court Order, I  
21 hereby certify that the above documents(s) was uploaded to the website and will  
be posted on the website by the close of the next business day and the  
22 webmaster will give e-mail notification to all parties.

23 ☒ **FEDERAL:** I declare that I am employed in the office of a member of the State  
24 Bar of this Court at whose direction the service was made.

25 Executed on July 21, 2016, at Irvine, California.

26   
27 Carol Rico  
28



**SERVICE LIST**  
**USDC, Southern District Case No. 3:16-cv-01228-BAS-WVG**  
**SHAWNA DERRINGER v. QUICKEN LOANS, INC., et al.**  
**File # 102369.0045**

Shawna Derringer  
1200 High Bluff Avenue  
San Marcos, CA 92078

Plaintiff, **In Pro Per**

(Via Email – Return Receipt Requested)  
(Via Federal Express)

Tel.: (858) 449-6046  
Email: sderringer@gmail.com  
disputeresolutions@outlook.com